

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
*Philadelphia Division*

IN RE:

SAMANTHA K NARANJO

Case No. 23-12249-amc  
Chapter 13

Freedom Mortgage Corporation,  
Movant

vs.

SAMANTHA K NARANJO ,  
Debtor

**WITHDRAWAL OF OBJECTION TO CONFIRMATION OF DEBTOR'S  
CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its legal counsel, hereby withdraws its OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN filed on August 18, 2023, Doc # 12.

This 18th day of January, 2024.

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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Freedom Mortgage Corporation, Movant	
vs.	
SAMANTHA K NARANJO , Debtor	

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Withdrawal of Objection to Confirmation of Debtor's Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

BRAD J. Sadek, Debtor's Attorney  
1500 JFK Boulevard  
Ste 220  
Philadelphia, PA 19102  
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SCOTT F. WATERMAN [Chapter 13], Bankruptcy Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

Office of United States Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street Suite 320  
Philadelphia, PA 19107

Via First Class Mail:

SAMANTHA K NARANJO  
3225 BELGREEN ROAD

PHILADELPHIA, PA 19154

Date: January 19, 2024

/s/Andrew Spivack

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